

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF FLORIDA  
PENSACOLA DIVISION**

PRESIDENT DONALD J. TRUMP,  
45<sup>th</sup> President of the United States of  
America, in his individual capacity,

Plaintiff,

v.

SIMON & SCHUSTER, INC., a New  
York corporation, ROBERT  
WOODWARD p.k.a. BOB  
WOODWARD, an individual, and  
PARAMOUNT GLOBAL, a Delaware  
corporation f/k/a VIACOMCBS, INC.,  
a Delaware corporation, f/k/a Viacom  
Inc., successor by merger to  
CBS Corporation, a Pennsylvania  
corporation f/k/a Westinghouse Electric  
Corporation,

Defendants.

Civil Action Number:

3:23-cv-02333-MCR-ZCB

**RULE 7.1 DISCLOSURE STATEMENT FOR DEFENDANT SIMON &  
SCHUSTER, INC.**

Pursuant to Rule 7.1(a)(1) of the Federal Rules of Civil Procedure Defendant

Simon & Schuster, Inc. hereby states that Simon & Schuster, Inc. is an indirect, wholly-owned subsidiary of Paramount Global (f/k/a ViacomCBS Inc.). Paramount Global is a publicly traded company. National Amusements, Inc., a privately held company, beneficially owns the majority of the Class A voting stock of Paramount Global. Paramount Global is only aware, without further inquiry, that Berkshire Hathaway Inc., a publicly traded company, beneficially owns at least 10% of Paramount Global's total common stock, i.e., Class A and Class B on a combined basis, as reported on a Form 13F filed with the Securities and Exchange Commission on February 14, 2023.

Pursuant to F.R.C.P. Rule 7.1(a)(2) and 28 U.S.C. § 1332(c), Simon & Schuster is a citizen of New York.

Dated: March 24, 2023

**GUNSTER, YOAKLEY & STEWART, P.A.**

*/s/ Kenneth B. Bell*

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*Attorneys for Robert Woodward, Simon &  
Schuster, Inc. and Paramount Global*

*Pro Hac Vice Pending\*<sup>1</sup>*

**CERTIFICATE OF SERVICE**

I hereby certify that on March 24, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Kenneth B. Bell

Attorney

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<sup>1</sup> Motions for Admission Pro Hac Vice were filed on March 23, 2023 for all counsel of record from Davis Wright Tremaine, LLP. See ECF Nos. 9-12. All counsel have completed the online tutorial and other requirements of Local Rule 11.1.